

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ROKU, INC.,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,  
LIMITED LIABILITY COMPANIES,  
PARTNERSHIPS, AND  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE A TO THE  
COMPLAINT,

Defendants.

Case No. 1:22-cv-02168-PKC

~~PROPOSED~~ **PRELIMINARY INJUNCTION ORDER**

**THIS MATTER** comes before the Court on Plaintiff Roku Inc.'s ("Roku" or "Plaintiff") application, brought by way of Order to Show Cause, for entry of a Preliminary Injunction (the "Application") against the Defendants identified on Schedule A to the [Proposed] Preliminary Injunction Order attached hereto (collectively, the "PI Defendants") and using at least the domain names identified in the Schedule A to the [Proposed] Preliminary Injunction Order (the "PI Defendant Domain Names") and the online marketplace accounts identified in the Schedule A to the [Proposed] Preliminary Injunction Order (the "Online Marketplace Accounts"); and

**THE COURT** having reviewed the papers in support of and in opposition to the Application (~~if any~~); and the Court having found that Plaintiff meets the criteria for entry of preliminary injunctive relief; and

no papers  
having been  
filed

and there being no  
appearance by any defendant  
at the preliminary injunction  
hearing on April 19, 2022 in Courtroom 11D

This Court further finds that it has personal jurisdiction over the PI Defendants because the PI Defendants directly target their business activities toward consumers in the United States, including New York, offering to sell and ship products into this Judicial District. Specifically, the PI Defendants are reaching out to do business with New York residents by operating one or more commercial, interactive Internet Stores through which New York residents can purchase counterfeit products bearing, using, or infringing on Plaintiff's trademarks, which are covered by, amongst others, U.S. Trademark Registration Nos. 6464718, 6076830, 5886527, 5886526, 5151588, 4937515, 4937514, 4937513, 4843920, 4839473, 4618984, 4286059, 4286058, 3177666 (collectively, the "Roku Trademarks"); and

**THIS COURT** having determined that the evidence submitted in support of the Application establishes Plaintiff has a likelihood of success on the merits; that no remedy at law exists; and that Plaintiff will suffer irreparable harm if the injunction is not granted including for example

1. Through the Declarations of Michael Yellin and Karina Levitian and accompanying evidence, Plaintiff has proved a prima facie case of trademark infringement because (1) the Roku Trademarks are distinctive marks and registered with the U.S. Patent and Trademark Office on the Principal Register and Supplemental Register, (2) through the substantial time, money and other resources expended by Plaintiff to promote the Roku Trademarks, the Roku Trademarks are widely recognized and exclusive associated as being products sourced from Roku and thus are sufficiently distinctive to distinguish Roku's goods from the goods of others; (3) PI Defendants are not licensed or authorized to use the Roku Trademarks, and (4) PI Defendants' use of the Roku Trademarks is

- causing a likelihood of confusion as to the origin or sponsorship of PI Defendants' products with Plaintiff; and
2. PI Defendants' continued and unauthorized use of the Roku Trademarks irreparably harms Plaintiff through diminished goodwill and brand confidence, damage to Plaintiff's reputation, loss of exclusivity, and loss of future sales.
  3. Monetary damages fail to address such damage and, therefore, Plaintiff has an inadequate remedy at law; and
  4. The public interest is served by entry of this Preliminary Injunction to dispel the public confusion created by PI Defendants' actions; and

**THIS COURT** having determined, therefore, that injunctive relief previously granted in the Temporary Restraining Order ("**TRO**") on March 17, 2022 [Dkt. No. 16] and extended on March 25, 2022 [Dkt. No. 18] should remain in place through the pendency of this litigation and that issuing this Preliminary Injunction is warranted under the Federal Rule of Civil Procedure 65;

**NOW THEREFORE**, on this 19<sup>th</sup> day of April, 2022, this Court **ORDERS** that:

1. PI Defendants, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under or in active concert with them be temporarily enjoined and restrained from:

- a. Using Plaintiff's Roku Trademarks or any reproductions, counterfeit copies, or colorable imitations thereof in any manner in connection with the distribution, marketing, advertising, offering for sale, or sale of any product that not authorized by Plaintiff to be sold in connection with Plaintiff's Roku Trademarks;

b. Passing off, inducing, or enabling others to sell or pass off any product that is not Plaintiff's or not properly bearing, using, and sold utilizing the Roku Trademarks under the authorization, control, or supervision of Plaintiff and approved by Plaintiff for sale under Plaintiff's Roku Trademarks;

c. Committing any acts calculated to cause consumers to believe that PI Defendants' products are those sold under the authorization, control or supervision of Plaintiff, or are sponsored by, approved by, or otherwise connected with Plaintiff;

d. Further infringing Plaintiff's Roku Trademarks and damaging Plaintiff's goodwill;

e. Otherwise competing unfairly with Plaintiff in any manner;

f. Shipping, delivering, holding for sale, transferring or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory not manufactured by or for Plaintiff, nor authorized by Plaintiff to be sold or offered for sale, and which bear any of Plaintiff's Roku Trademarks and/or any reproductions, counterfeit copies, or colorable imitations thereof;

g. Using, linking to, transferring, selling, exercising control over, or otherwise owning the Online Marketplace Accounts, the PI Defendant Domain Names, or any other domain name or online marketplace account that is being used to sell or is the means by which PI Defendants could continue to sell counterfeit products bearing, using, or infringing on the Roku Trademarks; and

h. Operating and/or hosting websites at the PI Defendant Domain Names and any other domain names registered or operated by PI Defendants that are involved with the distribution, marketing, advertising, offering for sale, or sale of any product bearing the Plaintiff's

Roku Trademarks and/or any reproductions, counterfeit copies, or colorable imitations thereof that is not authorized by Plaintiff to be sold in connection with the Plaintiff's Roku Trademarks.

2. Each Defendant, within fourteen (14) days after receiving notice of this Order, shall serve upon Plaintiff a written report under oath providing: (a) their true name and physical address, (b) all websites and online marketplace accounts on any platform that they own and/or operate (c) their financial accounts, including all Wish, Amazon, PayPal, Payoneer, Alibaba, LianLian, AllPay, Ping Pong, Coinbase, AllPay, Union Mobile, World First, Paxful, Stripe, Shopify, and eBay accounts, and (d) the steps taken by each Defendant to comply with paragraph 1, a through h, above.

3. The domain name registries for the PI Defendant Domain Names, including, but not Limited to, VeriSign, Inc., Neustar, Inc., Afilias Limited, CentralNic, Nominet, and the Public Interest Registry, within three (3) business days of receipt of this Order or prior to expiration of this Order, whichever date shall occur first, shall disable the PI Defendant Domain Names and make them inactive and untransferable until further ordered by this Court.

4. Those in privity with PI Defendants and with actual notice of this Order, including any online marketplaces such as AliExpress, Amazon, DHGate, eBay, Joom, and Wish, social media platforms, Facebook, YouTube, LinkedIn, Twitter, Internet search engines such as Google, Bing, and Yahoo, web hosts for the PI Defendant Domain Names, and domain name registrars, shall within three (3) business days of receipt of this Order:

a. disable and cease providing services for any accounts through which PI Defendants engage in the sale of counterfeit and infringing goods using the Roku Trademarks, including any accounts associated with the PI Defendants;

b. disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of counterfeit and infringing goods using the Roku Trademarks to the [Proposed] Preliminary Injunction Order; and

c. take all steps necessary to prevent links to the PI Defendant Domain Names identified on the Schedule A to the [Proposed] Preliminary Injunction Order from displaying in search results, including, but not limited to, removing links to the PI Defendant Domain Names from any search index.

5. PI Defendants and any third party with actual notice of this Order who is providing services for any of the PI Defendants, or in connection with any of PI Defendants' websites at the PI Defendant Domain Names or other websites operated by PI Defendants, including, without limitation, any online marketplace platforms such as AliExpress, Amazon, DHGate, eBay, Joom, and Wish, Facebook, Internet Service Providers ("ISP"), web hosts, back-end service providers, web designers, sponsored search engine or ad-word providers, banks, merchant account providers, including Wish, Amazon, PayPal, Payoneer, Alibaba, LianLian, AllPay, Ping Pong, Coinbase, AllPay, Union Mobile, World First, Paxful, Stripe, Shopify, and eBay, third party processors and other payment processing service providers, shippers, and domain name registrars (collectively, the "Third Party Providers") shall, within five (5) business days after receipt of such notice, provide to Plaintiff expedited discovery, including copies of all documents and records in such person's or entity's possession or control relating to:

a. The identities and locations of PI Defendants, their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including all known contact information;

b. The nature of PI Defendants' operations and all associated sales and financial information, including, without limitation, identifying information associated with the Online Marketplace Accounts, the PI Defendant Domain Names, and PI Defendants' financial accounts, as well as providing a full accounting of PI Defendants' sales and listing history related to their respective Online Marketplace Accounts and PI Defendant Domain Names;

c. PI Defendants' websites and/or any Online Marketplace Accounts;

d. The PI Defendant Domain Names or any domain name registered by PI Defendants; and

e. Any financial accounts owned or controlled by PI Defendants, including their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including such accounts residing with or under the control of any banks, savings and loan associations, payment processors or other financial institutions, including, without limitation, Wish, Amazon, PayPal, Payoneer, Alibaba, LianLian, AllPay, Ping Pong, Coinbase, AllPay, Union Mobile, World First, Paxful, Stripe, Shopify, and eBay, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).

6. PI Defendants and any persons in active concert or participation with them who have actual notice of this Order shall be temporarily restrained and enjoined from transferring or disposing of any money or other of PI Defendants' assets until further ordered by this Court.

7. Western Union shall, within five (5) business days of receipt of this Order, block any Western Union money transfers and funds from being received by the PI Defendants identified in Schedule A to the [Proposed] Preliminary Injunction Order until further ordered by this Court.

8. AliExpress, Amazon, DHGate, eBay, Joom, and Wish shall, within five (5) business days of receipt of this Order, for any PI Defendant or any of PI Defendants' Online Marketplace Accounts or websites:

a. Locate all accounts and funds connected to and related to PI Defendants, Defendants' Online Marketplace Accounts or PI Defendants' websites, including, but not limited to, any Amazon, PayPal, Payoneer, LianLian, AllPay, Ping Pong, Coinbase, Union Mobile, and eBay accounts connected to and related to the information listed in Schedule A to the [Proposed] Preliminary Injunction Order; and

b. Restrain and enjoin any such accounts or funds from transferring or disposing of any money or other of PI Defendants' assets until further ordered by this Court.

9. Any banks, savings and loan associations, payment processors, or other financial institutions, for any PI Defendant or any of PI Defendants' Online Marketplace Accounts or websites, shall within five (5) business days of receipt of this Order:

a. Locate all accounts and funds connected to PI Defendants, PI Defendants' Online Marketplace Accounts or PI Defendants' websites, including, but not limited to, any accounts connected to the information listed in the Schedule A to the [Proposed] Preliminary Injunction Order; and

b. Restrain and enjoin such accounts from receiving, transferring or disposing of any money or other of PI Defendants' assets until further ordered by this Court.

10. Plaintiff may provide notice of these proceedings to PI Defendants by electronically publishing a link to the Complaint, this Order and other relevant documents on a website or by sending an e-mail to all e-mail addresses identified by Plaintiff and any e-mail addresses provided for PI Defendants by third parties that includes a link to said website. The combination of



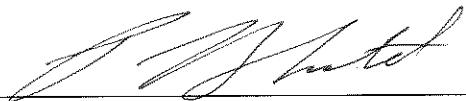
providing notice via electronic publication or e-mail, along with any notice that PI Defendants receive from domain name registrars and payment processors, shall constitute notice reasonably calculated under all circumstances to apprise PI Defendants of the pendency of the action and afford them the opportunity to present their objections.

11. Plaintiff's Schedule A to the Complaint, Exhibit 2 to the Declaration of Karina Levitian and the TRO shall become unsealed.

12. Any Defendants that are subject to this Order may appear and move to dissolve or modify the Order on two days' notice to Plaintiff or on shorter notice as set by this Court.

13. The five thousand dollars (\$5,000.00) bond posted by Plaintiff shall remain with the Court until a final disposition of this case or until this Preliminary Injunction is terminated.

Dated: April 19, 2022  
11:15 a.m.

  
\_\_\_\_\_  
Honorable P. Kevin Castel  
U.S.D.J.

**SCHEDULE A TO [PROPOSED] PRELIMINARY INJUNCTION ORDER**

<b>Doe No.</b>	<b>PI Defendant</b>	<b>PI Defendant Domain Names or Online Marketplace Accounts</b>
1.	03 TWINS 30 Store	<a href="https://www.aliexpress.com/store/910554239">https://www.aliexpress.com/store/910554239</a>
2.	360 Degree Store	<a href="https://www.aliexpress.com/store/912488679">https://www.aliexpress.com/store/912488679</a>
3.	3-C Digital technique Store	<a href="https://www.aliexpress.com/store/5654025">https://www.aliexpress.com/store/5654025</a>
4.	3C Electro-World Store	<a href="https://www.aliexpress.com/store/4518016">https://www.aliexpress.com/store/4518016</a>
5.	3C Game Dropshipping Store	<a href="https://www.aliexpress.com/store/4888028">https://www.aliexpress.com/store/4888028</a>
6.	3C Global Dropshipping Store	<a href="https://www.aliexpress.com/store/2857031">https://www.aliexpress.com/store/2857031</a>
7.	3C Global Store	<a href="https://www.aliexpress.com/store/507931">https://www.aliexpress.com/store/507931</a>
8.	3CAAA Store	<a href="https://www.aliexpress.com/store/5586069">https://www.aliexpress.com/store/5586069</a>
9.	3C-CCC Quality Store	<a href="https://www.aliexpress.com/store/912418462">https://www.aliexpress.com/store/912418462</a>
10.	3C-Digital World Dropshipping Store	<a href="https://www.aliexpress.com/store/5255205">https://www.aliexpress.com/store/5255205</a>
11.	3C-E Enterprise Store	<a href="https://www.aliexpress.com/store/5879380">https://www.aliexpress.com/store/5879380</a>
12.	3C-GANG Store	<a href="https://www.aliexpress.com/store/5571124">https://www.aliexpress.com/store/5571124</a>
13.	3CMarket Store	<a href="https://www.aliexpress.com/store/912491153">https://www.aliexpress.com/store/912491153</a>
14.	3C-Speciality Store	<a href="https://www.aliexpress.com/store/911604492">https://www.aliexpress.com/store/911604492</a>
15.	3C-To Be First Store	<a href="https://www.aliexpress.com/store/911257395">https://www.aliexpress.com/store/911257395</a>
16.	3C-Top Store	<a href="https://www.aliexpress.com/store/5197015">https://www.aliexpress.com/store/5197015</a>
17.	3C-top-world Store	<a href="https://www.aliexpress.com/store/5717086">https://www.aliexpress.com/store/5717086</a>
18.	3C-World Dropshipping Store	<a href="https://www.aliexpress.com/store/5239200">https://www.aliexpress.com/store/5239200</a>
19.	A Tree 3C-Dropshipping Store	<a href="https://www.aliexpress.com/store/5508038">https://www.aliexpress.com/store/5508038</a>
20.	AB Elec Factory Store	<a href="https://www.aliexpress.com/store/5006381">https://www.aliexpress.com/store/5006381</a>
21.	ABPU Store	<a href="https://www.aliexpress.com/store/5045386">https://www.aliexpress.com/store/5045386</a>
22.	accessories good Store	<a href="https://www.aliexpress.com/store/912470611">https://www.aliexpress.com/store/912470611</a>
23.	A-G-A-G-Technology Store	<a href="https://www.aliexpress.com/store/912680411">https://www.aliexpress.com/store/912680411</a>
24.	AJ29 Store	<a href="https://www.aliexpress.com/store/5782181">https://www.aliexpress.com/store/5782181</a>
25.	AK- Computer Store	<a href="https://www.aliexpress.com/store/911890241">https://www.aliexpress.com/store/911890241</a>

<b>Doe No.</b>	<b>PI Defendant</b>	<b>PI Defendant Domain Names or Online Marketplace Accounts</b>
26.	ALE-TEC Store	<a href="https://www.aliexpress.com/store/4776012">https://www.aliexpress.com/store/4776012</a>
27.	Ali-Students Supplies Store	<a href="https://www.aliexpress.com/store/3428007">https://www.aliexpress.com/store/3428007</a>
28.	ALL A Store	<a href="https://www.aliexpress.com/store/5781718">https://www.aliexpress.com/store/5781718</a>
29.	All Categories Factory 01 Store	<a href="https://www.aliexpress.com/store/5606506">https://www.aliexpress.com/store/5606506</a>
30.	All Categories Factory 02 Store	<a href="https://www.aliexpress.com/store/5586365">https://www.aliexpress.com/store/5586365</a>
31.	All0et Official Store	<a href="https://www.aliexpress.com/store/2948157">https://www.aliexpress.com/store/2948157</a>
32.	All-in Technique Store	<a href="https://www.aliexpress.com/store/5442200">https://www.aliexpress.com/store/5442200</a>
33.	an illusion	<a href="https://www.aliexpress.com/store/1332027">https://www.aliexpress.com/store/1332027</a>
34.	Aphrodit's Wardrobe Store	<a href="https://www.aliexpress.com/store/2986008">https://www.aliexpress.com/store/2986008</a>
35.	Attract Your Attention Store	<a href="https://www.aliexpress.com/store/3152052">https://www.aliexpress.com/store/3152052</a>
36.	BANGBANGBANG Store	<a href="https://www.aliexpress.com/store/5517028">https://www.aliexpress.com/store/5517028</a>
37.	beautiful in white 66 Store	<a href="https://www.aliexpress.com/store/912690097">https://www.aliexpress.com/store/912690097</a>
38.	Besthealth Store	<a href="https://www.aliexpress.com/store/5731195">https://www.aliexpress.com/store/5731195</a>
39.	B-healthier Store	<a href="https://www.aliexpress.com/store/5739327">https://www.aliexpress.com/store/5739327</a>
40.	Breaking The Waves Store	<a href="https://www.aliexpress.com/store/911319005">https://www.aliexpress.com/store/911319005</a>
41.	Buytra Electronic Store	<a href="https://www.aliexpress.com/store/2657093">https://www.aliexpress.com/store/2657093</a>
42.	C ube World Store	<a href="https://www.aliexpress.com/store/2980011">https://www.aliexpress.com/store/2980011</a>
43.	call me koko Store	<a href="https://www.aliexpress.com/store/5019172">https://www.aliexpress.com/store/5019172</a>
44.	CC Smart-Digital Store	<a href="https://www.aliexpress.com/store/2954144">https://www.aliexpress.com/store/2954144</a>
45.	C-C-C Electro Store	<a href="https://www.aliexpress.com/store/912031375">https://www.aliexpress.com/store/912031375</a>
46.	CCC World Store	<a href="https://www.aliexpress.com/store/900242128">https://www.aliexpress.com/store/900242128</a>
47.	CE Dropshipping Store	<a href="https://www.aliexpress.com/store/5008130">https://www.aliexpress.com/store/5008130</a>
48.	Century 3C Tech Store	<a href="https://www.aliexpress.com/store/5003520">https://www.aliexpress.com/store/5003520</a>
49.	CE-World Store	<a href="https://www.aliexpress.com/store/5719100">https://www.aliexpress.com/store/5719100</a>
50.	Computer Grocery Online Store	<a href="https://www.aliexpress.com/store/912485027">https://www.aliexpress.com/store/912485027</a>

<b>Doe No.</b>	<b>PI Defendant</b>	<b>PI Defendant Domain Names or Online Marketplace Accounts</b>
51.	Computer Parts Factory Store	<a href="https://www.aliexpress.com/store/5891076">https://www.aliexpress.com/store/5891076</a>
52.	Computer Peripheral Discount Store	<a href="https://www.aliexpress.com/store/911614494">https://www.aliexpress.com/store/911614494</a>
53.	Computer World 01 Store	<a href="https://www.aliexpress.com/store/912068787">https://www.aliexpress.com/store/912068787</a>
54.	Consumer E-fans Store	<a href="https://www.aliexpress.com/store/5046331">https://www.aliexpress.com/store/5046331</a>
55.	cool-lest Store	<a href="https://www.aliexpress.com/store/911332102">https://www.aliexpress.com/store/911332102</a>
56.	CY The show Store	<a href="https://www.aliexpress.com/store/911416430">https://www.aliexpress.com/store/911416430</a>
57.	Daily 3C-Accessory Store	<a href="https://www.aliexpress.com/store/911607531">https://www.aliexpress.com/store/911607531</a>
58.	DiDiBaby Store	<a href="https://www.aliexpress.com/store/5240291">https://www.aliexpress.com/store/5240291</a>
59.	Digital and Stationery Store	<a href="https://www.aliexpress.com/store/912170541">https://www.aliexpress.com/store/912170541</a>
60.	Digital Biubiu Store	<a href="https://www.aliexpress.com/store/5874459">https://www.aliexpress.com/store/5874459</a>
61.	Digital High-Tech Store	<a href="https://www.aliexpress.com/store/5875474">https://www.aliexpress.com/store/5875474</a>
62.	Digital Precise macy Store	<a href="https://www.aliexpress.com/store/5742229">https://www.aliexpress.com/store/5742229</a>
63.	Digital Tech World Store	<a href="https://www.aliexpress.com/store/5722102">https://www.aliexpress.com/store/5722102</a>
64.	Digital Trend Store	<a href="https://www.aliexpress.com/store/832521">https://www.aliexpress.com/store/832521</a>
65.	Digital&Game Killer Store	<a href="https://www.aliexpress.com/store/5886363">https://www.aliexpress.com/store/5886363</a>
66.	DISS Store	<a href="https://www.aliexpress.com/store/5068370">https://www.aliexpress.com/store/5068370</a>
67.	DreamGogo Store	<a href="https://www.aliexpress.com/store/910801036">https://www.aliexpress.com/store/910801036</a>
68.	EagleElectronic Store	<a href="https://www.aliexpress.com/store/910547274">https://www.aliexpress.com/store/910547274</a>
69.	EKitchenHome Store	<a href="https://www.aliexpress.com/store/5001118">https://www.aliexpress.com/store/5001118</a>
70.	Electronica de Consumo Store	<a href="https://www.aliexpress.com/store/4808034">https://www.aliexpress.com/store/4808034</a>
71.	E-Strength Store	<a href="https://www.aliexpress.com/store/4847004">https://www.aliexpress.com/store/4847004</a>
72.	E-Top Store	<a href="https://www.aliexpress.com/store/5887344">https://www.aliexpress.com/store/5887344</a>
73.	Facilitatelifelife Store	<a href="https://www.aliexpress.com/store/3245101">https://www.aliexpress.com/store/3245101</a>
74.	fanli04 Store	<a href="https://www.aliexpress.com/store/912464095">https://www.aliexpress.com/store/912464095</a>
75.	FashionLady Store	<a href="https://www.aliexpress.com/store/3427002">https://www.aliexpress.com/store/3427002</a>
76.	Finding & Fun Garden Store	<a href="https://www.aliexpress.com/store/2674039">https://www.aliexpress.com/store/2674039</a>
77.	flowcross Store	<a href="https://www.aliexpress.com/store/1283494">https://www.aliexpress.com/store/1283494</a>

<b>Doe No.</b>	<b>PI Defendant</b>	<b>PI Defendant Domain Names or Online Marketplace Accounts</b>
78.	Frise Computer Store	<a href="https://www.aliexpress.com/store/5880399">https://www.aliexpress.com/store/5880399</a>
79.	funy & Furious Store	<a href="https://www.aliexpress.com/store/912499686">https://www.aliexpress.com/store/912499686</a>
80.	Global AETOP Store	<a href="https://www.aliexpress.com/store/910562341">https://www.aliexpress.com/store/910562341</a>
81.	Global Outdoor Sporting Store	<a href="https://www.aliexpress.com/store/5240294">https://www.aliexpress.com/store/5240294</a>
82.	Global Supermarket Dropshipping Store	<a href="https://www.aliexpress.com/store/2819034">https://www.aliexpress.com/store/2819034</a>
83.	Global-PC Store	<a href="https://www.aliexpress.com/store/4388016">https://www.aliexpress.com/store/4388016</a>
84.	Goodhoo Spatial Store	<a href="https://www.aliexpress.com/store/911421447">https://www.aliexpress.com/store/911421447</a>
85.	HAFT Store	<a href="https://www.aliexpress.com/store/5652014">https://www.aliexpress.com/store/5652014</a>
86.	Handbag Dropshipping Store	<a href="https://www.aliexpress.com/store/5096048">https://www.aliexpress.com/store/5096048</a>
87.	Healthy 31Life Store	<a href="https://www.aliexpress.com/store/5747096">https://www.aliexpress.com/store/5747096</a>
88.	HFElectronic Stationery Store	<a href="https://www.aliexpress.com/store/912467523">https://www.aliexpress.com/store/912467523</a>
89.	High 3C Store	<a href="https://www.aliexpress.com/store/3626087">https://www.aliexpress.com/store/3626087</a>
90.	High end remote control direct Store	<a href="https://www.aliexpress.com/store/912242412">https://www.aliexpress.com/store/912242412</a>
91.	Home-Magic General Merchandise Store	<a href="https://www.aliexpress.com/store/5588499">https://www.aliexpress.com/store/5588499</a>
92.	Home-Treasure Store	<a href="https://www.aliexpress.com/store/5606505">https://www.aliexpress.com/store/5606505</a>
93.	INDUCTANCE Store	<a href="https://www.aliexpress.com/store/4836002">https://www.aliexpress.com/store/4836002</a>
94.	Jennifer's electric Store	<a href="https://www.aliexpress.com/store/5624370">https://www.aliexpress.com/store/5624370</a>
95.	Jinggle Store	<a href="https://www.aliexpress.com/store/4727004">https://www.aliexpress.com/store/4727004</a>
96.	Kazu Digital Store	<a href="https://www.aliexpress.com/store/912468407">https://www.aliexpress.com/store/912468407</a>
97.	Keep-Real World Store	<a href="https://www.aliexpress.com/store/5595325">https://www.aliexpress.com/store/5595325</a>
98.	KEN-TEC Store	<a href="https://www.aliexpress.com/store/911600539">https://www.aliexpress.com/store/911600539</a>
99.	KOQZM Official Store	<a href="https://www.aliexpress.com/store/3632075">https://www.aliexpress.com/store/3632075</a>
100.	KungFuPanda Store	<a href="https://www.aliexpress.com/store/5797652">https://www.aliexpress.com/store/5797652</a>
101.	L- Computer Store	<a href="https://www.aliexpress.com/store/5679013">https://www.aliexpress.com/store/5679013</a>
102.	Laptop adapter factory store	<a href="https://www.aliexpress.com/store/4992156">https://www.aliexpress.com/store/4992156</a>
103.	Large Digital Life Store	<a href="https://www.aliexpress.com/store/912458095">https://www.aliexpress.com/store/912458095</a>
104.	LeadElectronic Store	<a href="https://www.aliexpress.com/store/910557277">https://www.aliexpress.com/store/910557277</a>

<b>Doe No.</b>	<b>PI Defendant</b>	<b>PI Defendant Domain Names or Online Marketplace Accounts</b>
105.	Life With Intelligence Store	<a href="https://www.aliexpress.com/store/910316241">https://www.aliexpress.com/store/910316241</a>
106.	LifeTechnology-H&N Store	<a href="https://www.aliexpress.com/store/5513034">https://www.aliexpress.com/store/5513034</a>
107.	Lili an Store	<a href="https://www.aliexpress.com/store/5067257">https://www.aliexpress.com/store/5067257</a>
108.	LOJALA Store	<a href="https://www.aliexpress.com/store/600479">https://www.aliexpress.com/store/600479</a>
109.	lovejewelry04	<a href="https://www.aliexpress.com/store/433316">https://www.aliexpress.com/store/433316</a>
110.	LOVING Store	<a href="https://www.aliexpress.com/store/3656020">https://www.aliexpress.com/store/3656020</a>
111.	LRM 625 Store	<a href="https://www.aliexpress.com/store/912180460">https://www.aliexpress.com/store/912180460</a>
112.	LuckyElectronic Store	<a href="https://www.aliexpress.com/store/5883363">https://www.aliexpress.com/store/5883363</a>
113.	Magician 3c Store	<a href="https://www.aliexpress.com/store/5035026">https://www.aliexpress.com/store/5035026</a>
114.	MBM-Chip Store	<a href="https://www.aliexpress.com/store/1245924">https://www.aliexpress.com/store/1245924</a>
115.	Mr JETTING Store	<a href="https://www.aliexpress.com/store/5405014">https://www.aliexpress.com/store/5405014</a>
116.	My eSports world Store	<a href="https://www.aliexpress.com/store/4660061">https://www.aliexpress.com/store/4660061</a>
117.	My knowledge grove Store	<a href="https://www.aliexpress.com/store/5003484">https://www.aliexpress.com/store/5003484</a>
118.	My LovelyHome Store	<a href="https://www.aliexpress.com/store/5240292">https://www.aliexpress.com/store/5240292</a>
119.	NANDITO Official Store	<a href="https://www.aliexpress.com/store/1813365">https://www.aliexpress.com/store/1813365</a>
120.	niceol Store	<a href="https://www.aliexpress.com/store/932203">https://www.aliexpress.com/store/932203</a>
121.	Numerical Code Dropshipping Store	<a href="https://www.aliexpress.com/store/911289007">https://www.aliexpress.com/store/911289007</a>
122.	OP Shop Store	<a href="https://www.aliexpress.com/store/912272067">https://www.aliexpress.com/store/912272067</a>
123.	ORIGINALRM Store	<a href="https://www.aliexpress.com/store/911846032">https://www.aliexpress.com/store/911846032</a>
124.	Ostrovsky And Korchagin Store	<a href="https://www.aliexpress.com/store/911187146">https://www.aliexpress.com/store/911187146</a>
125.	Papejo Store	<a href="https://www.aliexpress.com/store/3430006">https://www.aliexpress.com/store/3430006</a>
126.	PC New Product Store	<a href="https://www.aliexpress.com/store/911605491">https://www.aliexpress.com/store/911605491</a>
127.	PC Peripheral Store	<a href="https://www.aliexpress.com/store/1283542">https://www.aliexpress.com/store/1283542</a>
128.	PowerOne Store	<a href="https://www.aliexpress.com/store/1876523">https://www.aliexpress.com/store/1876523</a>
129.	PRO Consumer Electrolics Store	<a href="https://www.aliexpress.com/store/1353054">https://www.aliexpress.com/store/1353054</a>
130.	Professional 3C-Accessories Store	<a href="https://www.aliexpress.com/store/911427104">https://www.aliexpress.com/store/911427104</a>
131.	Ray-E Store	<a href="https://www.aliexpress.com/store/911547211">https://www.aliexpress.com/store/911547211</a>



<b>Doe No.</b>	<b>PI Defendant</b>	<b>PI Defendant Domain Names or Online Marketplace Accounts</b>
132.	Remote Of The World Store	<a href="https://www.aliexpress.com/store/912068300">https://www.aliexpress.com/store/912068300</a>
133.	safaa Store	<a href="https://www.aliexpress.com/store/912485368">https://www.aliexpress.com/store/912485368</a>
134.	SafeMall Store	<a href="https://www.aliexpress.com/store/2969058">https://www.aliexpress.com/store/2969058</a>
135.	Safety Supplies Franchise Store	<a href="https://www.aliexpress.com/store/5382325">https://www.aliexpress.com/store/5382325</a>
136.	SafetyProtective Store	<a href="https://www.aliexpress.com/store/5703017">https://www.aliexpress.com/store/5703017</a>
137.	Sales remote control Store	<a href="https://www.aliexpress.com/store/1837271">https://www.aliexpress.com/store/1837271</a>
138.	School Computer Nectwork Store	<a href="https://www.aliexpress.com/store/912617501">https://www.aliexpress.com/store/912617501</a>
139.	Shazam-Electronic-Accessories Store	<a href="https://www.aliexpress.com/store/910808033">https://www.aliexpress.com/store/910808033</a>
140.	Shenzhen Huaqiang E-lectronic Products Store	<a href="https://www.aliexpress.com/store/4982033">https://www.aliexpress.com/store/4982033</a>
141.	Shenzhen OUTLETS Store	<a href="https://www.aliexpress.com/store/1043348">https://www.aliexpress.com/store/1043348</a>
142.	Shop Computer officess Store	<a href="https://www.aliexpress.com/store/912697089">https://www.aliexpress.com/store/912697089</a>
143.	Shop3928006 Store	<a href="https://www.aliexpress.com/store/3928006">https://www.aliexpress.com/store/3928006</a>
144.	Shop4538025 Store	<a href="https://www.aliexpress.com/store/4538025">https://www.aliexpress.com/store/4538025</a>
145.	Shop5000173 Store	<a href="https://www.aliexpress.com/store/5000173">https://www.aliexpress.com/store/5000173</a>
146.	Shop5075301 Store	<a href="https://www.aliexpress.com/store/5075301">https://www.aliexpress.com/store/5075301</a>
147.	Shop5594539 Store	<a href="https://www.aliexpress.com/store/5594539">https://www.aliexpress.com/store/5594539</a>
148.	Shop5693037 Store	<a href="https://www.aliexpress.com/store/5693037">https://www.aliexpress.com/store/5693037</a>
149.	Shop5736095 Store	<a href="https://www.aliexpress.com/store/5736095">https://www.aliexpress.com/store/5736095</a>
150.	Shop910316152 Store	<a href="https://www.aliexpress.com/store/910316152">https://www.aliexpress.com/store/910316152</a>
151.	Shop910322077 Store	<a href="https://www.aliexpress.com/store/910322077">https://www.aliexpress.com/store/910322077</a>
152.	Shop910324339 Store	<a href="https://www.aliexpress.com/store/910324339">https://www.aliexpress.com/store/910324339</a>
153.	Shop910362299 Store	<a href="https://www.aliexpress.com/store/910362299">https://www.aliexpress.com/store/910362299</a>
154.	Shop910713003 Store	<a href="https://www.aliexpress.com/store/910713003">https://www.aliexpress.com/store/910713003</a>
155.	Shop910745175 Store	<a href="https://www.aliexpress.com/store/910745175">https://www.aliexpress.com/store/910745175</a>

<b>Doe No.</b>	<b>PI Defendant</b>	<b>PI Defendant Domain Names or Online Marketplace Accounts</b>
156.	Shop911109154 Store	<a href="https://www.aliexpress.com/store/911109154">https://www.aliexpress.com/store/911109154</a>
157.	Shop911256083 Store	<a href="https://www.aliexpress.com/store/911256083">https://www.aliexpress.com/store/911256083</a>
158.	Simphone Store	<a href="https://www.aliexpress.com/store/4378100">https://www.aliexpress.com/store/4378100</a>
159.	SimpleStone	<a href="https://www.aliexpress.com/store/1848439">https://www.aliexpress.com/store/1848439</a>
160.	Smarter Elements Store	<a href="https://www.aliexpress.com/store/910962010">https://www.aliexpress.com/store/910962010</a>
161.	Stationery Dropshipping Store	<a href="https://www.aliexpress.com/store/3438004">https://www.aliexpress.com/store/3438004</a>
162.	Study Business Accessory Store	<a href="https://www.aliexpress.com/store/4988495">https://www.aliexpress.com/store/4988495</a>
163.	S-y-m Elec Retail Store	<a href="https://www.aliexpress.com/store/911727229">https://www.aliexpress.com/store/911727229</a>
164.	TCEKEA Store	<a href="https://www.aliexpress.com/store/911839257">https://www.aliexpress.com/store/911839257</a>
165.	Technical-Life Store	<a href="https://www.aliexpress.com/store/911510064">https://www.aliexpress.com/store/911510064</a>
166.	Thank you for your attention Store	<a href="https://www.aliexpress.com/store/5044289">https://www.aliexpress.com/store/5044289</a>
167.	Think different Store	<a href="https://www.aliexpress.com/store/5886273">https://www.aliexpress.com/store/5886273</a>
168.	ThreeC For Future Life Store	<a href="https://www.aliexpress.com/store/911426282">https://www.aliexpress.com/store/911426282</a>
169.	Top 3C World	<a href="https://www.aliexpress.com/store/633378">https://www.aliexpress.com/store/633378</a>
170.	Top-Daily Necessities Store	<a href="https://www.aliexpress.com/store/5589518">https://www.aliexpress.com/store/5589518</a>
171.	Top-Handicraft Dropshipping Store	<a href="https://www.aliexpress.com/store/5240293">https://www.aliexpress.com/store/5240293</a>
172.	TOP-TECH Store	<a href="https://www.aliexpress.com/store/910362300">https://www.aliexpress.com/store/910362300</a>
173.	TTOP Store	<a href="https://www.aliexpress.com/store/5053361">https://www.aliexpress.com/store/5053361</a>
174.	U Consumer Store	<a href="https://www.aliexpress.com/store/4406165">https://www.aliexpress.com/store/4406165</a>
175.	UEB Store	<a href="https://www.aliexpress.com/store/3615095">https://www.aliexpress.com/store/3615095</a>
176.	Update your lifestyle Store	<a href="https://www.aliexpress.com/store/5714117">https://www.aliexpress.com/store/5714117</a>
177.	VACOOE Store	<a href="https://www.aliexpress.com/store/912398378">https://www.aliexpress.com/store/912398378</a>
178.	WonderElectronics Store	<a href="https://www.aliexpress.com/store/910322051">https://www.aliexpress.com/store/910322051</a>
179.	Worldwide Drop Shipping Store	<a href="https://www.aliexpress.com/store/3376003">https://www.aliexpress.com/store/3376003</a>
180.	WowSL Store	<a href="https://www.aliexpress.com/store/911816503">https://www.aliexpress.com/store/911816503</a>



<b>Doe No.</b>	<b>PI Defendant</b>	<b>PI Defendant Domain Names or Online Marketplace Accounts</b>
181.	Xiao Li Grocery Store	<a href="https://www.aliexpress.com/store/911607630">https://www.aliexpress.com/store/911607630</a>
182.	Xiao Yu's Store	<a href="https://www.aliexpress.com/store/3095087">https://www.aliexpress.com/store/3095087</a>
183.	Yahou,surprising! Store	<a href="https://www.aliexpress.com/store/5600072">https://www.aliexpress.com/store/5600072</a>
184.	Yannis Game Store	<a href="https://www.aliexpress.com/store/912269075">https://www.aliexpress.com/store/912269075</a>
185.	Yinga E-cigarette Store	<a href="https://www.aliexpress.com/store/912069548">https://www.aliexpress.com/store/912069548</a>
186.	YZ Information Appliance Store	<a href="https://www.aliexpress.com/store/911055053">https://www.aliexpress.com/store/911055053</a>
187.	ZHUOYUEJIA Store	<a href="https://www.aliexpress.com/store/912686177">https://www.aliexpress.com/store/912686177</a>
188.	Fine Remote	<a href="https://www.amazon.com/sp?seller=A2IWPRXJZY2LOV">https://www.amazon.com/sp?seller=A2IWPRXJZY2LOV</a>
190.	HKMASK	<a href="https://www.amazon.com/sp?seller=AJFVUPSIL2NCG">https://www.amazon.com/sp?seller=AJFVUPSIL2NCG</a>
191.	JISOWA123	<a href="https://www.amazon.com/sp?seller=A15BAAQVYEFRAL">https://www.amazon.com/sp?seller=A15BAAQVYEFRAL</a>
192.	JOY TOMMY	<a href="https://www.amazon.com/sp?seller=A3F37DTS0HWDNT">https://www.amazon.com/sp?seller=A3F37DTS0HWDNT</a>
193.	KCI REMOTE INC	<a href="https://www.amazon.com/sp?seller=A32K60O8WKZKWP">https://www.amazon.com/sp?seller=A32K60O8WKZKWP</a>
194.	yosenlia	<a href="https://www.amazon.com/sp?seller=A2WYSXPARG16R9">https://www.amazon.com/sp?seller=A2WYSXPARG16R9</a>
195.	Young-Electronics	<a href="https://www.amazon.com/sp?seller=A1KATB9KBEMHB7">https://www.amazon.com/sp?seller=A1KATB9KBEMHB7</a>
196.	yuedaxindian	<a href="https://www.amazon.com/sp?seller=A2N02F6FON0VWO">https://www.amazon.com/sp?seller=A2N02F6FON0VWO</a>
197.	sun4finger	<a href="https://www.dhgate.com/store/about-us/21156520.html">https://www.dhgate.com/store/about-us/21156520.html</a>
198.	wind1398	<a href="https://www.dhgate.com/store/about-us/19904170.html">https://www.dhgate.com/store/about-us/19904170.html</a>
199.	yiguangbaozhuang	<a href="https://www.dhgate.com/store/about-us/21740561.html">https://www.dhgate.com/store/about-us/21740561.html</a>
200.	2015sgfird	<a href="https://www.ebay.com/usr/2015sgfird">https://www.ebay.com/usr/2015sgfird</a>
201.	6us_ik04zhp	<a href="https://www.ebay.com/usr/6us_ik04zhp">https://www.ebay.com/usr/6us_ik04zhp</a>
202.	arnas-20	<a href="https://www.ebay.com/usr/arnas-20">https://www.ebay.com/usr/arnas-20</a>
203.	asarajan-0	<a href="https://www.ebay.com/usr/asarajan-0">https://www.ebay.com/usr/asarajan-0</a>
204.	cheng182018	<a href="https://www.ebay.com/usr/cheng182018">https://www.ebay.com/usr/cheng182018</a>
205.	craft-e-store	<a href="https://www.ebay.com/usr/craft-e-store">https://www.ebay.com/usr/craft-e-store</a>
206.	dherigtech	<a href="https://www.ebay.com/usr/dherigtech">https://www.ebay.com/usr/dherigtech</a>
207.	genuinetvparts	<a href="https://www.ebay.com/usr/genuinetvparts">https://www.ebay.com/usr/genuinetvparts</a>
208.	gospring	<a href="https://www.ebay.com/usr/gospring">https://www.ebay.com/usr/gospring</a>
209.	harshi-514	<a href="https://www.ebay.com/usr/harshi-514">https://www.ebay.com/usr/harshi-514</a>
210.	henyyue	<a href="https://www.ebay.com/usr/henyyue">https://www.ebay.com/usr/henyyue</a>
211.	hixon_game	<a href="https://www.ebay.com/usr/hixon_game">https://www.ebay.com/usr/hixon_game</a>
212.	kikiduk	<a href="https://www.ebay.com/usr/kikiduk">https://www.ebay.com/usr/kikiduk</a>
213.	ls-limited	<a href="https://www.ebay.com/usr/ls-limited">https://www.ebay.com/usr/ls-limited</a>
214.	mingfulai	<a href="https://www.ebay.com/usr/mingfulai">https://www.ebay.com/usr/mingfulai</a>

<b>Doe No.</b>	<b>PI Defendant</b>	<b>PI Defendant Domain Names or Online Marketplace Accounts</b>
215.	ousalahs	<a href="https://www.ebay.com/usr/ousalahs">https://www.ebay.com/usr/ousalahs</a>
216.	quan-mt	<a href="https://www.ebay.com/usr/quan-mt">https://www.ebay.com/usr/quan-mt</a>
217.	randimaliyanage	<a href="https://www.ebay.com/usr/randimaliyanage">https://www.ebay.com/usr/randimaliyanage</a>
218.	remo_lt	<a href="https://www.ebay.com/usr/remo_lt">https://www.ebay.com/usr/remo_lt</a>
219.	sysmcch	<a href="https://www.ebay.com/usr/sysmcch">https://www.ebay.com/usr/sysmcch</a>
222.	wanbaoxin	<a href="https://www.ebay.com/usr/wanbaoxin">https://www.ebay.com/usr/wanbaoxin</a>
223.	wanthk6	<a href="https://www.ebay.com/usr/wanthk6">https://www.ebay.com/usr/wanthk6</a>
224.	weifengdianzi	<a href="https://www.ebay.com/usr/weifengdianzi">https://www.ebay.com/usr/weifengdianzi</a>
225.	3C Assembly	<a href="https://www.joom.com/en/stores/5df30b7e8b451303012cc1d3">https://www.joom.com/en/stores/5df30b7e8b451303012cc1d3</a>
226.	anginggang	<a href="https://www.joom.com/en/stores/618b8acd0100fbe46ed9415c">https://www.joom.com/en/stores/618b8acd0100fbe46ed9415c</a>
227.	Consumer Electronics	<a href="https://www.joom.com/en/stores/5d9e9be38b45130301958ad6">https://www.joom.com/en/stores/5d9e9be38b45130301958ad6</a>
228.	Digital Malls	<a href="https://www.joom.com/en/stores/5e0018d51436d40301104f01">https://www.joom.com/en/stores/5e0018d51436d40301104f01</a>
229.	DZ PJ	<a href="https://www.joom.com/en/stores/5d9e9d148b4513030195d14f">https://www.joom.com/en/stores/5d9e9d148b4513030195d14f</a>
230.	E Consuming	<a href="https://www.joom.com/en/stores/5e0ee5ea36b54d0301c2806e">https://www.joom.com/en/stores/5e0ee5ea36b54d0301c2806e</a>
231.	Elec Parts	<a href="https://www.joom.com/en/stores/5dde3ed628fc710301ab19ca">https://www.joom.com/en/stores/5dde3ed628fc710301ab19ca</a>
232.	ELectric Equipment	<a href="https://www.joom.com/en/stores/5e0ee5fe8b2c370301268380">https://www.joom.com/en/stores/5e0ee5fe8b2c370301268380</a>
233.	Electronic Component	<a href="https://www.joom.com/en/stores/5e0ee5f41436d40301461c13">https://www.joom.com/en/stores/5e0ee5f41436d40301461c13</a>
234.	Haneng17	<a href="https://www.joom.com/en/stores/6195ba04b392420dc283207b">https://www.joom.com/en/stores/6195ba04b392420dc283207b</a>
235.	House 3C	<a href="https://www.joom.com/en/stores/5dde3ea428fc710301ab0260">https://www.joom.com/en/stores/5dde3ea428fc710301ab0260</a>
236.	isongWuQ	<a href="https://www.joom.com/en/stores/618352f9e2e959ebd2635db3">https://www.joom.com/en/stores/618352f9e2e959ebd2635db3</a>
237.	LXyugen	<a href="https://www.joom.com/en/stores/5dbbe0268b2c3703012b18f6">https://www.joom.com/en/stores/5dbbe0268b2c3703012b18f6</a>
238.	oliangangu	<a href="https://www.joom.com/en/stores/618b8765f9902ce043791022">https://www.joom.com/en/stores/618b8765f9902ce043791022</a>
239.	Others Electronics	<a href="https://www.joom.com/en/stores/5d9e9cee8b4513030195c808">https://www.joom.com/en/stores/5d9e9cee8b4513030195c808</a>
240.	unheWangh	<a href="https://www.joom.com/en/stores/61887ec1a0c9f384c75d1008">https://www.joom.com/en/stores/61887ec1a0c9f384c75d1008</a>
241.	Vedio Equipment	<a href="https://www.joom.com/en/stores/5e001a5636b54d0301d6876c">https://www.joom.com/en/stores/5e001a5636b54d0301d6876c</a>
242.	Wanguashan	<a href="https://www.joom.com/en/stores/618b88ee331019a56ee718e6">https://www.joom.com/en/stores/618b88ee331019a56ee718e6</a>
243.	Wanguqiang	<a href="https://www.joom.com/en/stores/61834fbdb4800bc3897ffc52">https://www.joom.com/en/stores/61834fbdb4800bc3897ffc52</a>
244.	Wuiaopeng	<a href="https://www.joom.com/en/stores/618880fc7f36f79656567978">https://www.joom.com/en/stores/618880fc7f36f79656567978</a>
245.	xiejing	<a href="https://www.joom.com/en/stores/6136f527fa169c5051bcb4a2">https://www.joom.com/en/stores/6136f527fa169c5051bcb4a2</a>
246.	Canquefredo	<a href="https://www.wish.com/merchant/614c4171bd3f302ae94113e2">https://www.wish.com/merchant/614c4171bd3f302ae94113e2</a>
247.	ronron1123	<a href="https://www.wish.com/merchant/58cba44edc245c51145ccccb">https://www.wish.com/merchant/58cba44edc245c51145ccccb</a>
248.	YK Remote	<a href="https://ykremote.com/our-company/">https://ykremote.com/our-company/</a>